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SDMS DocID 2095896

September 17, 1998

Kyle J. Chelius - 3HS12
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103

Re: Chem-Fab, Inc.; Hans Richard Becker

Dear Ms. Chelius:

Reference is made to the letter from James N. Webb to Hans Richard Becker dated August 14, 1998, and received by Mr. Becker on August 19, 1998, requesting information relating to the operation of Chem-Fab, Inc. pursuant to Section 104(e) of CERCLA. Reference also is made to my letter to you dated August 22, 1998, in which I advised that Mr. Becker consented to the release of information from the criminal matter involving Manfred DeRewal, Jr. which would answer the questions posed in Mr. Webb's letter.

The following constitutes additional information provided by Mr. Becker in response to the Section 104(e) letter. Mr. Becker's response shall constitute this letter, the information provided on August 22 as well as all information provided to the United States Department of Justice and the Environmental Protection Agency in the criminal proceeding. In making these responses, Mr. Becker does not waive his Fourth or

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Fifth Amendment rights to privacy and not to incriminate himself under the United States Constitution and reserves all other Constitutional or statutory rights or privileges which he possesses.

The following answers are in response to the questions posed by Mr. Webb:

1. ChemFab was a custom Chemical Machining Service Company. ChemFab did not make a product of its own. ChemFab manufactured a wide variety of small mechanical and electronic parts to customer drawings and specifications.

2. Photographic films and chemicals such as:

- A wide variety of thin gauge metals in coil and sheet form.
- Photoresist, both liquid and dry.
- Ferric Chloride was used as the prime etchant chemical.
- Chromic acid was used as a cleaning agent and a resist stripping chemical.
- Xylene and mineral spirits were used as solvent and photoresist developer.
- Hydrochloric acid, sulfuric acid and nitric acid were used for surface treatment or oxidation removal when necessary.
- Caustic soda, soda ash, and sodium bisulfite were used in rinse water treatment.
- Chlorine gas was used in the re-generation process of ferric chloride.

3. Mr. Becker was employed as general manager in the fall of 1968. In early 1970, he became Executive Vice-President and in 1978 became President.

The responsibilities were the same regardless of the title. This was a small business (10 to 20) people requiring diversified tasks. Mr. Becker was involved in the sales,

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engineering, purchasing, accounting, production as well as the waste treatment and removal.

4. Harvey Radio of New York was the owner at the time Mr. Becker was hired. In 1978, the company was sold to the Borehead Corporation of Upper Black Eddy which was owned by the DeRewal family. Mr. Becker does not know the addresses of either of these corporations.

5. A, C & D: these were all Mr. Becker's responsibilities. With respect to 5(B), during the Harvey Radio ownership, Mr. Becker received authorization from that office when needed. During the Borehead years, Mr. Becker would need authorization from Mr. DeRewal, Sr.

6. The spent ferric chloride was stored in a tank and was returned to the supplier for recycling at the time fresh chemistry was delivered. The spent chromic acid was stored in drums or tank and removed by an authorized waste hauler. The hauler was Republic Environmental. The sludge from the waste water recycling was also picked up by Republic Environmental. During the last year of operation, Republic also picked up the spent ferric chloride. The spent mineral spirits were used as heating fuel.

7. Mr. Becker does not know of anyone who could assist in this inquiry but will, upon request, supply the EPA with the names and addresses of those employees he can recall.

8. The last knowledge Mr. Becker has is that Borehead owned the property but may have sold it to Little Eagle SA. Mr. Becker does not have any information relating to the addresses of these entities.

9. Financial Statement is enclosed.

10. Tax returns are enclosed.

11. None to the best of Mr. Becker's knowledge of which he has copies.

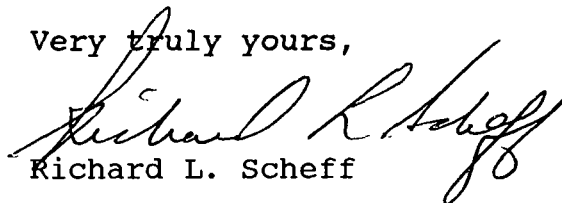
12. None.

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Please contact me if you require any additional
information.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Richard L. Scheff".

Richard L. Scheff

enclosures